

**EXHIBIT A**

Proposed Order

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION, *et al.*,

Defendants.

Adv. Proc. No. 20-00003-LTS

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

Adv. Proc. No. 20-00005-LTS

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

v.

AMBAC ASSURANCE CORPORATION, *et al.*,

Defendants.

**[PROPOSED] ORDER GRANTING GOVERNMENT PARTIES'  
URGENT MOTION FOR PROTECTIVE ORDER REGARDING  
SUBPOENAS *DUCES TECUM* TO GOVERNMENT PARTIES' LAW FIRMS**

Upon consideration of *Government Parties' Urgent Motion for Protective Order Regarding Subpoenas Duces Tecum to Government Parties' Law Firms* (the "Motion"),<sup>2</sup> filed on April 29, 2021 by the Government Parties, and the Court having found good cause to grant the relief requested therein, it is

**HEREBY ORDERED THAT:**

1. The Motion is GRANTED.
2. Defendants are directed to cease any and all efforts to obtain production from the Subpoenaed Firms any documents the Government Parties do not themselves agree to produce.
3. Any further efforts to obtain the production of documents from client files maintained by the Subpoenaed Firms must be directed to O'Melveny & Myers LLP and Proskauer Rose LLP.

Dated: \_\_\_\_\_, 2021

SO ORDERED:

\_\_\_\_\_  
Honorable Judith G. Dein  
United States Magistrate Judge

<sup>2</sup> Capitalized terms not defined herein have the same meaning as in the Motion.